

## UNITED STATES DISTRICT COURT - SOUTHERN DISTRICT OF TEXAS

- GALVESTON DIVISION -

JULIO A. ZUNIGA, et al., - CIVIL ACTION # 3:22-CV-00052

United States Courts  
Southern District of Texas  
FILED

VS.

MAY 11 2022

PATRICK O'DANIEL, et al.,

Nathan Ochsner, Clerk of Court

MOTION FOR PRODUCTION OF DOCUMENTS

RECENT FIRES BROKE-OUT ON K-LINE 4/29/22, ... THE SAME DAY THAT ACA - BOARD MEMBER AND TDCJ-EXEC. DIRECTOR: BRYAN COLLIER WAS ON SITE, IMMEDIATELY, AFTER FIRE BROKE OUT, MEN WERE DENIED ADEQUATE MEDICAL CARE FOR SMOKE INHALATION. IF INMATES REQUESTED IT, THEY WERE IMMEDIATELY TOLD THAT THEY WERE FAKING. MAJOR FREDRICK GOODEN, IS RESPONSIBLE FOR MANY DEATHS, INCLUDING "STEPHEN CURTIS" AN IWOC-MEMBER. ON CAMERA, THE COURTS WILL SEE WHY THE ACA IS NOW ON OUR LAWSUITS, ... WE WANT ACCESS TO REVIEW THE VIDEO OF THE ENTIRE EVENT, ... INCLUDING HOW ALL THE INMATES WERE PACKED INTO A DAYROOM WITH "75 OCCUPANT CAPACITY," ... WERE FORCED TO CROWD UP IN A SMOKE FILLED ROOM. ONLY MAJOR F. GOODEN WOULD DO SUCH A THING.

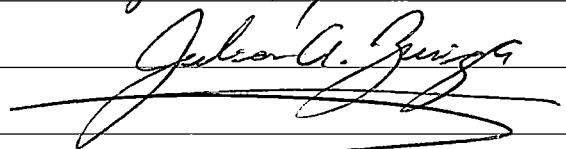
ON 5/4/22 - WARDEN CHEVALIER WAS HERE ON CAMERA, WALKING THE HALL, ... SHE'S NOT HERE TO VISIT, BUT TO RETALIATE ON US IWOC-MEMBERS. SUCH AS "BRYAN CAVETT." ... WE ARE REQUESTING SIGN-IN SHEET FOR THESE DAYS ON MEMORIAL UNIT, WE REQUEST PRESERVATION OF ALL INTER-OFFICE COMMUNICATION BETWEEN TBCJ/TDCJ AND BRYAN COLLIER AND WARDENS RATLIFF, DEMOSS, HAYES, CHEVALIER, AND TO PRODUCE E-MAIL'S OF ALL OFFICIALS REASONS FOR BEING HERE, ON THIS SPECIFIC UNIT.

Honorable Judge Jeff V. Brown

5/6/22

Respectfully Submitted,

Julio A. Zuniga

  
 IWOC-TEXAS